

ROPES & GRAY LLP  
Gregg M. Galardi  
D. Ross Martin  
Jonathan M. Agudelo  
Peter Walkingshaw (admitted *pro hac vice*)  
1211 Avenue of the Americas  
New York, NY 10036-8704  
Telephone: (212) 596-9000  
Facsimile: (212) 596-9090

*Counsel to the Debtors  
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X	:	
	:	
In re	:	Chapter 11
	:	
Gawker Media LLC, <i>et al.</i> , <sup>1</sup>	:	Case No. 16-11700 (SMB)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X	:	

**NOTICE OF WITHDRAWAL OF OBJECTION OF DEBTOR  
GAWKER MEDIA LLC TO PROOF OF CLAIM FILED BY SHIVA  
AYYADURAI, AND MOTION TO APPLY FED. R. CIV. P. 12(B)(6)  
AND 12(C), PURSUANT TO BANKRUPTCY RULES 9014 AND 7012**

**TO THE CLERK OF THE COURT:**

**PLEASE TAKE NOTICE** on September 28, 2016, Shiva Ayyadurai filed claim No. 268 against Gawker Media LLC ("Gawker Media").

**PLEASE TAKE FURTHER NOTICE** that on October 21, 2016, the Debtors filed the *Objection of Debtor Gawker Media LLC to Proof of Claim Filed by Shiva Ayyadurai, and*

---

<sup>1</sup> The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary Kft. (f/k/a Kinja Kft.) (5056). Gawker Media LLC and Gawker Media Group, Inc.'s mailing addresses are c/o Opportune LLP, Attn: William D. Holden, Chief Restructuring Officer, 10 East 53rd Street, 33rd Floor, New York, NY 10022. Gawker Hungary Kft.'s mailing address is c/o Opportune LLP, Attn: William D. Holden, 10 East 53rd Street, 33rd Floor, New York, NY 10022.

*Motion to Apply Fed. R. Civ. P. 12(b)(6) and 12(c), Pursuant to Bankruptcy Rules 9014 and 7012 [Docket No. 372] (the “Claim Objection”).*

**PLEASE TAKE FURTHER NOTICE** that on December 22, 2016, the Court entered the *Findings of Fact, Conclusions of Law, and Order Confirming Amended Joint Chapter 11 Plan of Liquidation for Gawker Media Group, Inc., Gawker Media LLC, and Gawker Hungary Kft.* [Docket No. 638] (the “Confirmation Order”), confirming the Debtors’ *Amended Joint Chapter 11 Plan of Liquidation for Gawker Media Group, Inc., Gawker Media LLC, and Gawker Hungary Kft.* [Docket No. 638, Exhibit 1] (as may be subsequently amended or modified, the “Plan”).

**PLEASE TAKE FURTHER NOTICE** that the Debtors and Dr. Ayyadurai executed the settlement agreement attached as exhibit D to the Plan Supplement<sup>2</sup> (the “Ayyadurai Claims Settlement”), which settles the Ayyadurai Claims. Pursuant to the Ayyadurai Claims Settlement and section 4.01(d) of the Plan, (i) Gawker Media agreed to pay Dr. Ayyadurai \$750,000 in Cash, (ii) the Ayyadurai Claims were deemed Allowed in such amount solely for purposes of voting on the Plan, and (iii) Dr. Ayyadurai waived any entitlement to Distributions from the Gawker Media Contingent Proceeds Creditor Account. The Court approved the Ayyadurai Claims Settlement pursuant to paragraphs 48 and 56 of the Confirmation Order.

**PLEASE TAKE FURTHER NOTICE** that on December 28, 2016, Gawker Media made a distribution of \$750,000 in respect of the Ayyadurai Claims Settlement. Accordingly, the Claim Objection is resolved as moot.

*[Remainder of this page intentionally left blank]*

---

<sup>2</sup> Any capitalized term not defined in this Notice shall have the meaning ascribed to such term in the Plan.

**PLEASE TAKE FURTHER NOTICE** that Gawker Media hereby withdraws the Claim  
Objection.

Dated: January 23, 2017  
New York, New York

/s/ Gregg M. Galardi  
ROPES & GRAY LLP  
Gregg M. Galardi  
D. Ross Martin  
Jonathan M. Agudelo  
Peter Walkingshaw (admitted *pro hac vice*)  
1211 Avenue of the Americas  
New York, NY 10036-8704  
Telephone: (212) 596-9000  
Facsimile: (212) 596-9090  
gregg.galardi@ropesgray.com  
ross.martin@ropesgray.com  
jonathan.agudelo@ropesgray.com  
peter.walkingshaw@ropesgray.com

*Counsel to the Debtors  
and Debtors in Possession*